

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165
T: 212-792-0046 • E: Joshua@levinepstein.com

April 24, 2023

Via Electronic Filing

The Honorable Judge Katherine Polk Failla
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 11201

Re: *Tucker v. Discount Tackle, LLC*
Case No.: 1:23-cv-02964-KPF

Dear Honorable Judge Polk Failla:

This law firm represents Defendant Discount Tackle, LLC (the “Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Rules of Practice in Civil Cases 2(C) and 2(D), this letter respectfully serves to request an extension of Defendant’s time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including May 24, 2023.

This is the first request of its nature and is made on consent of Plaintiff’s counsel.¹ If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [*see* Dckt. Nos. 7-8] and requires additional time to gather information from Defendant to respond to the Complaint.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
Joshua D. Levin-Epstein, Esq.
60 East 42nd Street, Suite 4700
New York, New York 10165
Tel. No.: (212) 792-0046
Email: Joshua@levinepstein.com
Attorneys for Defendant

VIA ECF: All Counsel

¹ Plaintiff’s counsel’s consent was conditioned on an acknowledgement from Defendants to waive any defenses to personal jurisdiction due to improper service of process.